

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE Valsartan N-Nitrosodimethylamine Products Liability Litigation	: : : : : :	Civil Action No. 1:19-MD-02875-RBK-JS
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**PROPOSED ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2019, upon consideration of the ZHP Defendants' Motion to Stay Proceedings Pending Entry of a Case Management Order, it is hereby ORDERED:

1. The motion for a stay is GRANTED;
2. All deadlines in the actions currently pending in, or later transferred to, the above-captioned multidistrict litigation are SUSPENDED and VACATED pending the initial case management conference, and until further order of the Court; and
3. All actions currently pending in, or later transferred to, the above-captioned multidistrict litigation are STAYED pending the initial case management conference, and until further order of the Court.

Dated: \_\_\_\_\_, 2019

\_\_\_\_\_  
**Honorable Robert B. Kugler**  
**U.S. District Judge**